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United States District Court  
Central District of California

**SUEROS&BEBIDAS  
REHIDRATANTES, S.A. de C.V., a  
Mexican company, and CAB  
ENTERPRISES, INC., a Delaware  
corporation,**

### **Plaintiffs.**

vs.

Eduardo Lopez, Ivonne Munoz,  
Manuel Vazquez, Yvonne Mesinas,  
Surtimex LLC, a California limited  
liability company, V&S Investment  
Group, Surtimex Global Inc., a  
California corporation  
Distrubuidora Vitian, S.A. de C.V., a  
Mexican company, Leni's  
Industries, Inc., a California  
corporation.

#### Defendants.

Case Number: 2:24-cv-10102

## ANSWER TO COMPLAINT

Defendants Ivonne Munoz, Manuel Vazquez, Yvonne Mesinas, Surtimex LLC, a California limited liability company, V&S Investment Group, Surtimex

1 Global Inc., a California corporation Distribuidora Vitian, S.A. de C.V., a  
2 Mexican company, Leni's Industries, Inc., a California corporation, hereby  
3 answer the complaint filed in the above entitled matter as follows:  
4

- 5 1. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 1 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.
- 8 2. These answering defendants lack sufficient information and/or belief  
9 to admit the allegations set forth in paragraph 2 of the complaint and  
10 therefore, on that basis, deny those allegations in their entirety.
- 11 3. These answering defendants lack sufficient information and/or belief  
12 to admit the allegations set forth in paragraph 3 of the complaint and  
13 therefore, on that basis, deny those allegations in their entirety.
- 14 4. These answering defendants lack sufficient information and/or belief  
15 to admit the allegations set forth in paragraph 4 of the complaint and  
16 therefore, on that basis, deny those allegations in their entirety.
- 17 5. These answering defendants deny the allegations set forth in  
18 paragraph 5 of the complaint in their entirety.
- 19 6. These answering defendants deny the allegations set forth in  
20 paragraph 6 of the complaint in their entirety.
- 21 7. These answering defendants deny the allegations set forth in  
22 paragraph 7 of the complaint in their entirety.

8. These answering defendants deny the allegations set forth in paragraph 8 of the complaint in their entirety.
9. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 9 of the complaint and therefore, on that basis, deny those allegations in their entirety.
10. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 10 of the complaint and therefore, on that basis, deny those allegations in their entirety.
11. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 11 of the complaint and therefore, on that basis, deny those allegations in their entirety.
12. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 12 of the complaint and therefore, on that basis, deny those allegations in their entirety.
13. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 13 of the complaint and therefore, on that basis, deny those allegations in their entirety.
14. These answering defendants admit the allegations set forth in paragraph 14 of the complaint, except for any allegations that the offer of sale, or sale of Electrolit by Eduardo Lopez is unauthorized which allegation is denied.

- 1       15. These answering defendants deny the allegations set forth in  
2                   paragraph 15 of the complaint in their entirety.  
3  
4       16. These answering defendants admit the allegations set forth in  
5                   paragraph 15 of the complaint, except for any allegations that the offer  
6                   of sale, or sale of Electrolit by Yvonne Munoz is unauthorized which  
7                   allegation is denied.  
8  
9       17. These answering defendants deny the allegations set forth in  
10                  paragraph 17 of the complaint in their entirety.  
11  
12      18. These answering defendants admit the allegations set forth in  
13                  paragraph 18 of the complaint.  
14  
15      19. These answering defendants deny the allegations set forth in  
16                  paragraph 19 of the complaint in their entirety.  
17  
18      20. These answering defendants deny the allegations set forth in  
19                  paragraph 20 of the complaint in their entirety.  
20  
21      21. These answering defendants lack sufficient information and/or belief  
22                  to admit the allegations set forth in paragraph 21 of the complaint and  
23                  therefore, on that basis, deny those allegations in their entirety.  
24  
25      22. These answering defendants admit the allegations set forth in  
26                  paragraph 22 of the complaint.  
27  
28      23. These answering defendants lack sufficient information and/or belief  
                to admit the allegations set forth in paragraph 23 of the complaint and  
                therefore, on that basis, deny those allegations in their entirety.

24. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 24 of the complaint and therefore, on that basis, deny those allegations in their entirety.

25. These answering defendants admit the allegations set forth in paragraph 25 of the complaint.

26. These answering defendants admit the allegations set forth in paragraph 26 of the complaint.

27. These answering defendants admit the allegations set forth in paragraph 27 of the complaint.

28. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 28 of the complaint and therefore, on that basis, deny those allegations in their entirety.

29. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 29 of the complaint and therefore, on that basis, deny those allegations in their entirety.

30. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 30 of the complaint and therefore, on that basis, deny those allegations in their entirety.

31. These answering defendants lack sufficient information and/or belief to admit the allegations set forth in paragraph 31 of the complaint and therefore, on that basis, deny those allegations in their entirety.

- 1       32. These answering defendants lack sufficient information and/or belief  
2                  to admit the allegations set forth in paragraph 32 of the complaint and  
3                  therefore, on that basis, deny those allegations in their entirety.  
4  
5       33. These answering defendants lack sufficient information and/or belief  
6                  to admit the allegations set forth in paragraph 33 of the complaint and  
7                  therefore, on that basis, deny those allegations in their entirety.  
8  
9       34. These answering defendants lack sufficient information and/or belief  
10                  to admit the allegations set forth in paragraph 34 of the complaint and  
11                  therefore, on that basis, deny those allegations in their entirety.  
12  
13      35. These answering defendants lack sufficient information and/or belief  
14                  to admit the allegations set forth in paragraph 35 of the complaint and  
15                  therefore, on that basis, deny those allegations in their entirety.  
16  
17      36. These answering defendants lack sufficient information and/or belief  
18                  to admit the allegations set forth in paragraph 36 of the complaint and  
19                  therefore, on that basis, deny those allegations in their entirety.  
20  
21      37. These answering defendants lack sufficient information and/or belief  
22                  to admit the allegations set forth in paragraph 37 of the complaint and  
23                  therefore, on that basis, deny those allegations in their entirety.  
24  
25      38. These answering defendants lack sufficient information and/or belief  
26                  to admit the allegations set forth in paragraph 24 of the complaint and  
27                  therefore, on that basis, deny those allegations in their entirety.  
28

- 1       39. These answering defendants lack sufficient information and/or belief  
2                  to admit the allegations set forth in paragraph 24 of the complaint and  
3                  therefore, on that basis, deny those allegations in their entirety.  
4
- 5       40. These answering defendants lack sufficient information and/or belief  
6                  to admit the allegations set forth in paragraph 40 of the complaint and  
7                  therefore, on that basis, deny those allegations in their entirety.  
8
- 9       41. These answering defendants lack sufficient information and/or belief  
10                  to admit the allegations set forth in paragraph 41 of the complaint and  
11                  therefore, on that basis, deny those allegations in their entirety.  
12
- 13      42. These answering defendants lack sufficient information and/or belief  
14                  to admit the allegations set forth in paragraph 42 of the complaint and  
15                  therefore, on that basis, deny those allegations in their entirety.  
16
- 17      43. These answering defendants lack sufficient information and/or belief  
18                  to admit the allegations set forth in paragraph 43 of the complaint and  
19                  therefore, on that basis, deny those allegations in their entirety.  
20
- 21      44. These answering defendants lack sufficient information and/or belief  
22                  to admit the allegations set forth in paragraph 44 of the complaint and  
23                  therefore, on that basis, deny those allegations in their entirety.  
24
- 25      45. These answering defendants lack sufficient information and/or belief  
26                  to admit the allegations set forth in paragraph 45 of the complaint and  
27                  therefore, on that basis, deny those allegations in their entirety.  
28

- 1       46. These answering defendants lack sufficient information and/or belief  
2              to admit the allegations set forth in paragraph 46 of the complaint and  
3              therefore, on that basis, deny those allegations in their entirety.  
4  
5       47. These answering defendants lack sufficient information and/or belief  
6              to admit the allegations set forth in paragraph 47 of the complaint and  
7              therefore, on that basis, deny those allegations in their entirety.  
8  
9       48. These answering defendants lack sufficient information and/or belief  
10              to admit the allegations set forth in paragraph 48 of the complaint and  
11              therefore, on that basis, deny those allegations in their entirety.  
12  
13      49. These answering defendants lack sufficient information and/or belief  
14              to admit the allegations set forth in paragraph 49 of the complaint and  
15              therefore, on that basis, deny those allegations in their entirety.  
16  
17      50. These answering defendants lack sufficient information and/or belief  
18              to admit the allegations set forth in paragraph 50 of the complaint and  
19              therefore, on that basis, deny those allegations in their entirety.  
20  
21      51. These answering defendants lack sufficient information and/or belief  
22              to admit the allegations set forth in paragraph 51 of the complaint and  
23              therefore, on that basis, deny those allegations in their entirety.  
24  
25      52. These answering defendants lack sufficient information and/or belief  
26              to admit the allegations set forth in paragraph 52 of the complaint and  
27              therefore, on that basis, deny those allegations in their entirety.  
28

- 1       53. These answering defendants lack sufficient information and/or belief  
2                  to admit the allegations set forth in paragraph 53 of the complaint and  
3                  therefore, on that basis, deny those allegations in their entirety.  
4
- 5       54. These answering defendants lack sufficient information and/or belief  
6                  to admit the allegations set forth in paragraph 54 of the complaint and  
7                  therefore, on that basis, deny those allegations in their entirety.  
8
- 9       55. These answering defendants lack sufficient information and/or belief  
10                  to admit the allegations set forth in paragraph 55 of the complaint and  
11                  therefore, on that basis, deny those allegations in their entirety.  
12
- 13      56. These answering defendants lack sufficient information and/or belief  
14                  to admit the allegations set forth in paragraph 56 of the complaint and  
15                  therefore, on that basis, deny those allegations in their entirety.  
16
- 17      57. These answering defendants lack sufficient information and/or belief  
18                  to admit the allegations set forth in paragraph 40 of the complaint and  
19                  therefore, on that basis, deny those allegations in their entirety.  
20
- 21      58. These answering defendants lack sufficient information and/or belief  
22                  to admit the allegations set forth in paragraph 40 of the complaint and  
23                  therefore, on that basis, deny those allegations in their entirety.  
24
- 25      59. These answering defendants lack sufficient information and/or belief  
26                  to admit the allegations set forth in paragraph 59 of the complaint and  
27                  therefore, on that basis, deny those allegations in their entirety.  
28

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- 1       60. These answering defendants lack sufficient information and/or belief  
2              to admit the allegations set forth in paragraph 60 of the complaint and  
3              therefore, on that basis, deny those allegations in their entirety.  
4
- 5       61. These answering defendants lack sufficient information and/or belief  
6              to admit the allegations set forth in paragraph 61 of the complaint and  
7              therefore, on that basis, deny those allegations in their entirety.  
8
- 9       62. These answering defendants lack sufficient information and/or belief  
10             to admit the allegations set forth in paragraph 62 of the complaint and  
11             therefore, on that basis, deny those allegations in their entirety.  
12
- 13      63. These answering defendants lack sufficient information and/or belief  
14             to admit the allegations set forth in paragraph 63 of the complaint and  
15             therefore, on that basis, deny those allegations in their entirety.  
16
- 17      64. These answering defendants lack sufficient information and/or belief  
18             to admit the allegations set forth in paragraph 40 of the complaint and  
19             therefore, on that basis, deny those allegations in their entirety.  
20
- 21      65. These answering defendants lack sufficient information and/or belief  
22             to admit the allegations set forth in paragraph 65 of the complaint and  
23             therefore, on that basis, deny those allegations in their entirety.  
24
- 25      66. These answering defendants lack sufficient information and/or belief  
26             to admit the allegations set forth in paragraph 66 of the complaint and  
27             therefore, on that basis, deny those allegations in their entirety.  
28

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- 1       67. These answering defendants lack sufficient information and/or belief  
2              to admit the allegations set forth in paragraph 67 of the complaint and  
3              therefore, on that basis, deny those allegations in their entirety.  
4
- 5       68. These answering defendants lack sufficient information and/or belief  
6              to admit the allegations set forth in paragraph 68 of the complaint and  
7              therefore, on that basis, deny those allegations in their entirety.  
8
- 9       69. These answering defendants lack sufficient information and/or belief  
10              to admit the allegations set forth in paragraph 69 of the complaint and  
11              therefore, on that basis, deny those allegations in their entirety.  
12
- 13      70. These answering defendants lack sufficient information and/or belief  
14              to admit the allegations set forth in paragraph 70 of the complaint and  
15              therefore, on that basis, deny those allegations in their entirety.  
16
- 17      71. These answering defendants lack sufficient information and/or belief  
18              to admit the allegations set forth in paragraph 71 of the complaint and  
19              therefore, on that basis, deny those allegations in their entirety.  
20
- 21      72. These answering defendants deny the allegations set forth in  
22              paragraph 72 of the complaint in their entirety.  
23
- 24      73. These answering defendants lack sufficient information and/or belief  
25              to admit the allegations set forth in paragraph 73 of the complaint and  
26              therefore, on that basis, deny those allegations in their entirety.  
27
- 28      74. These answering defendants admit the allegations set forth in  
            paragraph 74 of the complaint, except for any allegations that

1 individuals perform any alleged activities in their personal capacity  
2 and the offer of sale, or sale of Electrolit is unauthorized, which  
3 allegations are denied.  
4

5 75. These answering defendants lack sufficient information and/or belief  
6 to admit the allegations set forth in paragraph 75 of the complaint and  
7 therefore, on that basis, deny those allegations in their entirety.  
8

9 76. These answering defendants deny the allegations set forth in  
10 paragraph 76 of the complaint in their entirety.  
11

12 77. These answering defendants lack sufficient information and/or belief  
13 to admit the allegations set forth in paragraph 77 of the complaint and  
14 therefore, on that basis, deny those allegations in their entirety.  
15

16 78. These answering defendants deny the allegations set forth in  
17 paragraph 78 of the complaint in their entirety.  
18

19 79. These answering defendants deny the allegations set forth in  
20 paragraph 79 of the complaint in their entirety.  
21

22 80. These answering defendants deny the allegations set forth in  
23 paragraph 80 of the complaint in their entirety.  
24

25 81. These answering defendants lack sufficient information and/or belief  
26 to admit the allegations set forth in paragraph 81 of the complaint and  
27 therefore, on that basis, deny those allegations in their entirety.  
28

82. These answering defendants deny the allegations set forth in  
83 paragraph 82 of the complaint in their entirety.  
84

- 1       83. These answering defendants lack sufficient information and/or belief  
2                  to admit the allegations set forth in paragraph 83 of the complaint and  
3                  therefore, on that basis, deny those allegations in their entirety.  
4
- 5       84. These answering defendants lack sufficient information and/or belief  
6                  to admit the allegations set forth in paragraph 84 of the complaint and  
7                  therefore, on that basis, deny those allegations in their entirety.  
8
- 9       85. These answering defendants lack sufficient information and/or belief  
10                  to admit the allegations set forth in paragraph 85 of the complaint and  
11                  therefore, on that basis, deny those allegations in their entirety.  
12
- 13      86. These answering defendants deny the allegations set forth in  
14                  paragraph 82 of the complaint in their entirety.  
15
- 16      87. These answering defendants lack sufficient information and/or belief  
17                  to admit the allegations set forth in paragraph 87 of the complaint and  
18                  therefore, on that basis, deny those allegations in their entirety.  
19
- 20      88. These answering defendants lack sufficient information and/or belief  
21                  to admit the allegations set forth in paragraph 88 of the complaint and  
22                  therefore, on that basis, deny those allegations in their entirety.  
23
- 24      89. These answering defendants lack sufficient information and/or belief  
25                  to admit the allegations set forth in paragraph 89 of the complaint and  
26                  therefore, on that basis, deny those allegations in their entirety.  
27
- 28      90. These answering defendants deny the allegations set forth in  
                paragraph 90 of the complaint in their entirety.

- 1       91. These answering defendants lack sufficient information and/or belief  
2                  to admit the allegations set forth in paragraph 91 of the complaint and  
3                  therefore, on that basis, deny those allegations in their entirety.  
4
- 5       92. These answering defendants lack sufficient information and/or belief  
6                  to admit the allegations set forth in paragraph 92 of the complaint and  
7                  therefore, on that basis, deny those allegations in their entirety.  
8
- 9       93. These answering defendants lack sufficient information and/or belief  
10                  to admit the allegations set forth in paragraph 93 of the complaint and  
11                  therefore, on that basis, deny those allegations in their entirety.  
12
- 13      94. These answering defendants deny the allegations set forth in  
14                  paragraph 94 of the complaint in their entirety.  
15
- 16      95. These answering defendants lack sufficient information and/or belief  
17                  to admit the allegations set forth in paragraph 95 of the complaint and  
18                  therefore, on that basis, deny those allegations in their entirety.  
19
- 20      96. These answering defendants lack sufficient information and/or belief  
21                  to admit the allegations set forth in paragraph 96 of the complaint and  
22                  therefore, on that basis, deny those allegations in their entirety.  
23
- 24      97. These answering defendants lack sufficient information and/or belief  
25                  to admit the allegations set forth in paragraph 97 of the complaint and  
26                  therefore, on that basis, deny those allegations in their entirety.  
27
- 28      98. These answering defendants deny the allegations set forth in  
                paragraph 98 of the complaint in their entirety.

1       99. These answering defendants lack sufficient information and/or belief  
2           to admit the allegations set forth in paragraph 99 of the complaint and  
3           therefore, on that basis, deny those allegations in their entirety.  
4

5       100.          These answering defendants lack sufficient information  
6           and/or belief to admit the allegations set forth in paragraph 100 of the  
7           complaint and therefore, on that basis, deny those allegations in their  
8           entirety.  
9

10       101.          These answering defendants lack sufficient information  
11           and/or belief to admit the allegations set forth in paragraph 101 of the  
12           complaint and therefore, on that basis, deny those allegations in their  
13           entirety.  
14

15       102.          These answering defendants lack sufficient information  
16           and/or belief to admit the allegations set forth in paragraph 102 of the  
17           complaint and therefore, on that basis, deny those allegations in their  
18           entirety.  
19

20       103.          These answering defendants lack sufficient information  
21           and/or belief to admit the allegations set forth in paragraph 103 of the  
22           complaint and therefore, on that basis, deny those allegations in their  
23           entirety.  
24

25       104.          These answering defendants lack sufficient information  
26           and/or belief to admit the allegations set forth in paragraph 104 of the  
27  
28

1 complaint and therefore, on that basis, deny those allegations in their  
2 entirety.  
3

4 105. These answering defendants deny the allegations set forth in  
5 paragraph 105 of the complaint in their entirety.  
6

7 106. These answering defendants deny the allegations set forth in  
8 paragraph 106 of the complaint in their entirety.  
9

10 107. These answering defendants lack sufficient information  
11 and/or belief to admit the allegations set forth in paragraph 107 of the  
12 complaint and therefore, on that basis, deny those allegations in their  
13 entirety.  
14

15 108. These answering defendants lack sufficient information  
16 and/or belief to admit the allegations set forth in paragraph 108 of the  
17 complaint and therefore, on that basis, deny those allegations in their  
18 entirety.  
19

20 109. These answering defendants deny and admit the allegations  
21 set forth and/or incorporated by reference in paragraph 109 in direct  
22 accordance with these answering defendants' answer to the  
23 allegations therein referenced by incorporation.  
24

25 110. These answering defendants lack sufficient information  
26 and/or belief to admit the allegations set forth in paragraph 110 of the  
27 complaint and therefore, on that basis, deny those allegations in their  
28 entirety.  
29

111. These answering defendants deny the allegations set forth in  
112 paragraph 111 of the complaint in their entirety.
113. These answering defendants deny the allegations set forth in  
114 paragraph 113 of the complaint in their entirety.
115. These answering defendants deny the allegations set forth in  
116 paragraph 115 of the complaint in their entirety.
117. These answering defendants deny the allegations set forth in  
118 paragraph 117 in their entirety.
119. These answering defendants deny the allegations set forth in  
120 paragraph 119 in direct accordance with these answering defendants' answer to the  
121 allegations therein referenced by incorporation.
122. These answering defendants deny the allegations set forth in  
123 paragraph 120 of the complaint in their entirety.

- 1           121.       These answering defendants deny the allegations set forth in  
2                   paragraph 121 of the complaint in their entirety.  
3  
4           122.       These answering defendants deny the allegations set forth in  
5                   paragraph 122 of the complaint in their entirety.  
6  
7           123.       These answering defendants deny the allegations set forth in  
8                   paragraph 123 of the complaint in their entirety.  
9  
10          124.       These answering defendants deny the allegations set forth in  
11                   paragraph 124 of the complaint in their entirety.  
12  
13          125.       These answering defendants deny the allegations set forth in  
14                   paragraph 125 of the complaint in their entirety.  
15  
16          126.       These answering defendants lack sufficient information  
17                   and/or belief to admit the allegations set forth in paragraph 126 of the  
18                   complaint and therefore, on that basis, deny those allegations in their  
19                   entirety.  
20  
21          127.       These answering defendants deny the allegations set forth in  
22                   paragraph 127 of the complaint in their entirety.  
23  
24          128.       These answering defendants deny the allegations set forth in  
25                   paragraph 128 of the complaint in their entirety.  
26  
27          129.       These answering defendants deny the allegations set forth in  
28                   paragraph 129 of the complaint in their entirety.  
29  
30          130.       These answering defendants deny the allegations set forth in  
31                   paragraph 130 of the complaint in their entirety.

1           131.       These answering defendants deny and admit the allegations  
2           set forth and/or incorporated by reference in paragraph 131 in direct  
3           accordance with these answering defendants' answer to the  
4           allegations therein referenced by incorporation.

5  
6           132.       These answering defendants deny the allegations set forth in  
7           paragraph 132 of the complaint in their entirety.

8  
9           133.       These answering defendants deny the allegations set forth in  
10          paragraph 133 of the complaint in their entirety.

11          134.       These answering defendants deny the allegations set forth in  
12          paragraph 134 of the complaint in their entirety.

13          135.       These answering defendants deny the allegations set forth in  
14          paragraph 135 of the complaint in their entirety.

15          136.       These answering defendants deny the allegations set forth in  
16          paragraph 136 of the complaint in their entirety.

17          137.       These answering defendants deny the allegations set forth in  
18          paragraph 137 of the complaint in their entirety.

19          138.       These answering defendants deny the allegations set forth in  
20          paragraph 138 of the complaint in their entirety.

21          139.       These answering defendants deny and admit the allegations  
22          set forth and/or incorporated by reference in paragraph 139 in direct  
23          accordance with these answering defendants' answer to the  
24          allegations therein referenced by incorporation.

1           140.       These answering defendants deny the allegations set forth in  
2                          paragraph 140 of the complaint in their entirety.  
3

4           141.       These answering defendants deny the allegations set forth in  
5                          paragraph 141 of the complaint in their entirety.  
6

7           142.       These answering defendants deny the allegations set forth in  
8                          paragraph 142 of the complaint in their entirety.  
9

10          143.       These answering defendants deny the allegations set forth in  
11                          paragraph 143 of the complaint in their entirety.  
12

13          144.       These answering defendants lack sufficient information  
14                          and/or belief to admit the allegations set forth in paragraph 144 of the  
15                          complaint and therefore, on that basis, deny those allegations in their  
16                          entirety.  
17

18          145.       These answering defendants deny the allegations set forth in  
19                          paragraph 145 of the complaint in their entirety.  
20

21          146.       These answering defendants deny and admit the allegations  
22                          set forth and/or incorporated by reference in paragraph 146 in direct  
23                          accordance with these answering defendants' answer to the  
24                          allegations therein referenced by incorporation.  
25

26          147.       These answering defendants deny the allegations set forth in  
27                          paragraph 147 of the complaint in their entirety.  
28

29          148.       These answering defendants deny and admit the allegations  
30                          set forth and/or incorporated by reference in paragraph 148 in direct  
31

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.  
3

4 149. These answering defendants deny the allegations set forth in  
5 paragraph 149 of the complaint in their entirety.  
6

7 150. These answering defendants lack sufficient information  
8 and/or belief to admit the allegations set forth in paragraph 150 of the  
9 complaint and therefore, on that basis, deny those allegations in their  
10 entirety.  
11

12 151. These answering defendants deny the allegations set forth in  
13 paragraph 151 of the complaint in their entirety.  
14

15 152. These answering defendants deny and admit the allegations  
16 set forth and/or incorporated by reference in paragraph 152 in direct  
17 accordance with these answering defendants' answer to the  
18 allegations therein referenced by incorporation.  
19

20 153. These answering defendants deny the allegations set forth in  
21 paragraph 153 of the complaint in their entirety.  
22

23 154. These answering defendants deny the allegations set forth in  
24 paragraph 154 of the complaint in their entirety.  
25

26 155. These answering defendants deny the allegations set forth in  
27 paragraph 155 of the complaint in their entirety.  
28

156. These answering defendants deny the allegations set forth in  
paragraph 156 of the complaint in their entirety.

1       157.       These answering defendants deny the allegations set forth in  
2                   paragraph 157 of the complaint in their entirety.  
3

4       158.       These answering defendants deny the allegations set forth in  
5                   paragraph 158 of the complaint in their entirety.  
6

7       159.       These answering defendants deny the allegations set forth in  
8                   paragraph 159 of the complaint in their entirety.  
9

10      160.       These answering defendants deny the allegations set forth in  
11                   paragraph 160 of the complaint in their entirety.  
12

13      161.       These answering defendants deny the allegations set forth in  
14                   paragraph 161 of the complaint in their entirety.  
15

16      162.       These answering defendants deny the allegations set forth in  
17                   paragraph 162 of the complaint in their entirety.  
18

19      163.       These answering defendants deny and admit the allegations  
20                   set forth and/or incorporated by reference in paragraph 163 in direct  
21                   accordance with these answering defendants' answer to the  
22                   allegations therein referenced by incorporation.  
23

24      164.       These answering defendants deny the allegations set forth in  
25                   paragraph 164 of the complaint in their entirety.  
26

27      165.       These answering defendants deny the allegations set forth in  
28                   paragraph 165 of the complaint in their entirety.  
29

30      166.       These answering defendants deny the allegations set forth in  
31                   paragraph 166 of the complaint in their entirety.  
32

1           167.       These answering defendants deny and admit the allegations  
2           set forth and/or incorporated by reference in paragraph 167 in direct  
3           accordance with these answering defendants' answer to the  
4           allegations therein referenced by incorporation.

5  
6           168.       These answering defendants deny the allegations set forth in  
7           paragraph 168 of the complaint in their entirety.

8  
9           169.       These answering defendants deny the allegations set forth in  
10          paragraph 169 of the complaint in their entirety.

11          170.       These answering defendants deny the allegations set forth in  
12          paragraph 170 of the complaint in their entirety.

13          171.       These answering defendants deny the allegations set forth in  
14          paragraph 171 of the complaint in their entirety.

15  
16          172.       These answering defendants deny and admit the allegations  
17          set forth and/or incorporated by reference in paragraph 172 in direct  
18          accordance with these answering defendants' answer to the  
19          allegations therein referenced by incorporation.

20  
21          173.       These answering defendants deny the allegations set forth in  
22          paragraph 173 of the complaint in their entirety.

23  
24          174.       These answering defendants deny the allegations set forth in  
25          paragraph 174 of the complaint in their entirety.

26  
27          175.       These answering defendants deny and admit the allegations  
28          set forth and/or incorporated by reference in paragraph 175 in direct

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.  
3

4 176. These answering defendants deny the allegations set forth in  
5 paragraph 176 of the complaint in their entirety.  
6

7 177. These answering defendants deny the allegations set forth in  
8 paragraph 177 of the complaint in their entirety.  
9

10 178. These answering defendants deny the allegations set forth in  
11 paragraph 178 of the complaint in their entirety.  
12

13 179. These answering defendants deny the allegations set forth in  
14 paragraph 174 of the complaint in their entirety.  
15

16 180. These answering defendants deny the allegations set forth in  
17 paragraph 180 of the complaint in their entirety.  
18

19 181. These answering defendants deny the allegations set forth in  
20 paragraph 181 of the complaint in their entirety.  
21

22 182. These answering defendants deny the allegations set forth in  
23 paragraph 182 of the complaint in their entirety.  
24

25 183. These answering defendants deny the allegations set forth in  
26 paragraph 183 of the complaint in their entirety.  
27

28 184. These answering defendants deny the allegations set forth in  
paragraph 184 of the complaint in their entirety.  
185. These answering defendants deny and admit the allegations  
set forth and/or incorporated by reference in paragraph 185 in direct

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.  
3

4 186. These answering defendants lack sufficient information  
5 and/or belief to admit the allegations set forth in paragraph 186 of the  
6 complaint and therefore, on that basis, deny those allegations in their  
7 entirety.  
8

9 187. These answering defendants deny the allegations set forth in  
10 paragraph 187 of the complaint in their entirety.  
11

12 188. These answering defendants deny the allegations set forth in  
13 paragraph 188 of the complaint in their entirety.  
14

15 189. These answering defendants deny the allegations set forth in  
16 paragraph 189 of the complaint in their entirety.  
17

18 190. These answering defendants deny the allegations set forth in  
19 paragraph 190 of the complaint in their entirety.  
20

21 191. These answering defendants deny the allegations set forth in  
22 paragraph 191 of the complaint in their entirety.  
23

24 192. These answering defendants deny the allegations set forth in  
25 paragraph 192 of the complaint in their entirety.  
26

27 193. These answering defendants deny the allegations set forth in  
28 paragraph 193 of the complaint in their entirety.  
29

30 194. These answering defendants deny and admit the allegations  
31 set forth and/or incorporated by reference in paragraph 194 in direct  
32

1 accordance with these answering defendants' answer to the  
2 allegations therein referenced by incorporation.  
3

4 195. These answering defendants deny the allegations set forth in  
5 paragraph 195 of the complaint in their entirety.  
6

7 196. These answering defendants lack sufficient information  
8 and/or belief to admit the allegations set forth in paragraph 186 of the  
9 complaint and therefore, on that basis, deny those allegations in their  
10 entirety.  
11

12 197. These answering defendants deny the allegations set forth in  
13 paragraph 197 of the complaint in their entirety.  
14

#### **AFFIRMATIVE DEFENSES**

15 As and for its separate, alternative, affirmative defenses to the allegations  
16 made against it in the complaint filed in the above-entitled matter, defendant  
17 avers and alleges as follows:  
18

19 **Affirmative Defense No. 1**

20 The parties have reached accord and satisfaction as to some, or all of the  
21 causes of action alleged in the complaint;  
22

23 **Affirmative Defense No. 2**

24 Plaintiffs have expressly, or impliedly assumed the risk of each and every  
25 peril that is the subject of some, or all of the complaint filed in the above-  
26 entitled matter.  
27

28 ///

1                   **Affirmative Defense No. 3**

2                   Plaintiffs have voluntarily assumed the risk of any course of action  
3                   alleged to have been taken upon by these answering defendants.  
4

5                   **Affirmative Defense No. 4**

6                   To the extent that any cause alleged against these answering defendants  
7                   in the complaint includes negligence on the part of these answering  
8                   defendants, any damage resulting therefrom must be reduced by a sum  
9                   according to proof as a result of plaintiffs' contributory negligence.  
10

11                  **Affirmative Defense No. 5**

12                  Plaintiffs are estopped from instituting and/or maintaining this action  
13                  against these answering defendants.  
14

15                  **Affirmative Defense No. 6**

16                  Plaintiffs' fraud is the actual and proximate cause of any damage alleged  
17                  to have accrued to plaintiffs in this matter.  
18

19                  **Affirmative Defense No. 7**

20                  Any right or rights asserted by plaintiffs to accrue to them in this matter  
21                  is would be illegal if applied, or enforced.  
22

23                  **Affirmative Defense No. 8**

24                  This action and any remedy that may accrue to plaintiffs as a result of  
25                  any allegation, or allegations set forth in plaintiffs' complaint is barred by the  
26                  doctrine of laches.  
27

28                  ///

1                   **Affirmative Defense No. 9**

2                   At the time these answering defendants are alleged to have performed  
3 unlawful actions, they were doing so, if at all, under valid and subsisting license  
4 from the plaintiffs or otherwise obtained.

5                   **Affirmative Defense No. 10**

6                   This action is barred in whole or in part by the doctrine of res judicata.

7                   **Affirmative Defense No. 11**

8                   This action is barred by the applicable statute of limitation.

9                   **Affirmative Defense No. 12**

10                  Plaintiffs have expressly, or impliedly waived any rights, or claims they  
11 may have against these answering defendants.

12                  **Affirmative Defense No. 13**

13                  Plaintiffs lack standing to assert the causes of action set forth in the  
14 complaint.

15                  **Affirmative Defense No. 14**

16                  Any trade mark that inures to the benefit of plaintiffs are unenforceable  
17 by reason of plaintiffs' present and past use of those marks in a constant and  
18 systematic manner to circumvent the anti trust laws and to stifle competition  
19 as provided in 15 U.S.C. § 1115(b)(7)

20                  **WHEREFORE**, these answering defendants pray:

- 21                  1. That plaintiffs take nothing by way of their action;

- 1        2. That judgment enter in favor of these answering defendants on each and
- 2        every cause alleged by plaintiffs;
- 3        3. For an award of costs of this action, including a reasonable attorney's fee
- 4        where authorized by law, rule, custom, or practice; and
- 5        4. For such other and further relief as the court deems appropriate.

6  
7                    LLP

Dated: December 19, 2024

Romaine Lokhandwala Law Group,

*William A. Romaine*

William A. Romaine, Southern

District of Texas Bar #3896716, Attorneys  
for Defendant OZ Trading Group, Inc.

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14                    ///

15                    ///

16                    ///